

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

ADAM FERRARI,

Plaintiff,

v.

WILLIAM FRANCIS,

Defendant.

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CIVIL ACTION NO. 3:23-CV-455

**JOINT MOTION FOR ENTRY OF LIMITED STAY**

Pursuant to Fed. R. Civ. P. 26 and the Court’s inherent authority to manage the discovery process, Plaintiff, Adam Ferrari (“Ferrari” or “Plaintiff”), and Defendant, William Francis’s (“Francis” or “Defendant”), (collectively referred to herein as the “Parties”) respectfully request that the Court enter a limited stay. In support thereof, the Parties request a limited stay as follows: agree to the following, subject to the Court’s approval:

1. Until mediation is complete, only the following limited discovery, in this and all related cases, shall occur:
  - a. On the date Ferrari produces the “Dalmore Production” discussed below, Francis agrees to produce the insurance policies and the correspondence regarding said insurance policies;
  - b. Parties agree Ferrari can get the response to the Findit Subpoena;
  - c. Parties to respond to the Requests to Admit by January 22, 2024
  - d. Francis can serve a third-party subpoena on Docusign;
  - e. Ferrari agrees to produce the Dalmore production to Francis upon entry of the Protective Order governing confidential material;

f. To facilitate a meaningful mediation, Ferrari also agrees to provide the following, also by 1/22:

i. From the discovery to Ferrari:

1. Response to Request for Production 1;
2. Response to Request for Production 20;

ii. From the Subpoena to Phoenix:

1. Response to Request for Production 7 & 8;
2. Response to Request for Production 18; and

2. If the case does not settle at mediation, all outstanding discovery will be due 30 days later.

WHEREFORE, the Parties, Adam Ferrari and William Francis, request this Court enter the limited stay as agreed upon above for purposes of effectuating successful mediation of this matter and request any further relief this Court deems appropriate.

Respectfully submitted,

/s/Ross M. Good

One of Plaintiff's Attorneys

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**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(d)(1)(B), as amended, no certificate of service is necessary, because this document is being filed with the Court's electronic-filing system.

/s/ Ross M. Good

Ross M. Good